# **APPENDIX C:**

FCC Minimum Federal Standards Matrix Please see the following table for a point-by-point explanation of how we meet and/or exceed each of the minimum federal standards. Please note, we have included information regarding Captioned Telephone (CTS) standards.

FCC Minimum Standard	Applies to:	Compliant	Sprint's Approach
CA Training 47 C.F.R. § 64.604(a)(1)(i)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint offers a comprehensive training program designed to offer the best quality to all relay users. Sprint's 2-3 week program includes training on Diversified Culture, compliance with regulatory requirements, & the operation of Sprint's systems.
CA Skills 47 C.F.R. § 64.604(a)(1)(ii)	TRS, STS, CTS, IP CTS, IP Relay (Partially waived for CTS, IP CTS)	Exceeds	Sprint ensures all CAs are skilled in typing, grammar, spelling, & interpretation of typewritten ASL (as applicable), familiar with hearing & speech disability culture, language, & etiquette; & have clear & articulate voice communication skills.
CA Typing 47 C.F.R. § 64.604(a)(1)(iii)	TRS, STS, CTS, IP CTS, IP Relay (Waived/partially waived for CTS, IP CTS)	Exceeds	Sprint's CAs type &/or transcribe conversations at a rate greater than 60 words per minute. CA testing is conducted at least quarterly.
VRS CA Qualifications 47 C.F.R. § 64.604(a)(1)(iv)	VRS	N/A	This requirement is not applicable to the services being offered.
Call Takeover 47 C.F.R. § 64.604(a)(1)(v)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	As a general rule, Sprint allows CA takeovers only when necessary. Sprint's CAs stay with any given call for a minimum of 10 or 20 minutes, as defined by the FCC.
Gender Preference 47 C.F.R. § 64.604(a)(1)(vi)	TRS, STS, IP Relay (Waived for CTS, IP CTS)	Meets	Sprint makes its best efforts to accommodate its customers' requests regarding the gender of the CA handling their calls — both at call initiation &/or call takeover.
Real Time 47 C.F.R. § 64.604(a)(1)(vii)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint's sophisticated software enables real-time communication for all Relay users.
STS Voice Mute Option 47 C.F.R. § 64.604(a)(1)(viii)	STS (Waived for TRS, IP Relay, CTS, IP CTS)	Meets	Sprint offers STS users the option to mute their voice so the other party to the call will hear only the CA & will not hear the STS user's voice.
Confidentiality Rule 47 C.F.R. § 64.604(a)(2)(i)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint has systematic & operational processes intended to prevent disclosure of call content &/or Customer Proprietary Network Info (CPNI), except as authorized by 47 U.S.C. § 605. STS CAs may retain info from a particular call in order to facilitate the completion of consecutive calls, at the request of the user.
Conversation Content 47 C.F.R. § 64.604(a)(2)(ii)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint bars its CAs from intentionally altering the conversations they relay, except to the extent necessary to: (i) translate ASL calls to conversational English; (ii) facilitate STS calls without interfering with the independence of the user; or (iii) necessary to provide info to emergency responders.
Sequential Calls 47 C.F.R. § 64.604(a)(3)(i)	TRS, STS, IP Relay (Waived for CTS, IP CTS)	Meets	Sprint CAs do not refuse single or sequential calls.
Call Length 47 C.F.R. § 64.604(a)(3)(i)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint never limits the length of a Relay call.
Types of Calls 47 C.F.R. § 64.604(a)(3)(ii)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Except to the extent the requirements are waived, not permitted, or as the FCC determines that it is not technologically feasible to do so, Sprint services are capable of handling any type of call normally provided by telecommunications carriers.
Credit Authorization 47 C.F.R. § 64.604(a)(3)(iii)	TRS, STS, CTS (Waived for IP CTS, IP Relay)	Meets	Sprint understands it is permitted to decline a call if the user cannot pay or because a credit authorization for toll calls is denied.
Pay Per Calls 47 C.F.R. § 64.604(a)(3)(iv)	TRS, STS, CTS (Waived for IP CTS, IP Relay)	Exceeds	Sprint processes pay per calling for TRS & CapTel users with blocks available via the Customer Profile.

FCC Minimum Standard	Applies to:	Compliant	Sprint's Approach
Call Combinations	TRS (Partially	Meets	Sprint's Relay services support all mandatory FCC
47 C.F.R. §	waived for CTS, IP		call types.
64.604(a)(3)(v)	CTS, IP Relay)		
Call Release	TRS (Waived for	Meets	Sprint provides TTY-TTY call set-up which allows
47 C.F.R. §	CTS, IP CTS, IP		the CA to set-up the call & drop off the line, if not
64.604(a)(3)(vi)(1)	Relay)	Masta	needed to facilitate conversation.
Speed Dial 47 C.F.R. §	TRS, STS, CTS, IP Relay (Waived for	Meets	Sprint's TRS/CTS speed dial is available with a Customer Profile. CapTel users can select 3
64.604(a)(3)(vi)(2)	IP Relay)		speed dial buttons & a phone book for contacts.
Three-Way Calling	TRS, STS, CTS, IP	Meets	Sprint supports LEC-based three-way calling for its
47 C.F.R. §	Relay (Waived for		customers.
64.604(a)(3)(vi)(3)	IP CTS)		
Interactive Menus &	TRS, STS, CTS, IP	Exceeds	Sprint electronically captures recordings & makes
Voicemail	CTS, IP Relay		interactive recordings & voicemail/ answering
47 C.F.R. §			machines available to Relay customers. Sprint
64.604(a)(3)(vii)/(viii)			supports Sprint IP Text Mail so Sprint IP users can
			receive voicemail messages via email, when unable to answer.
Emergency Calls for	TRS, STS (N/A for	Meets	Sprint automatically & immediately connects
TTY-based providers	CTS, IP CTS, IP	Wicold	emergency calls to an appropriate Public Safety
47 C.F.R. §	Relay)		Answering Point (PSAP) which is capable of
64.604(a)(4)	,,		dispatching emergency services.
STS Called Numbers	STS (N/A for TRS,	Exceeds	Sprint allows STS users to register a Customer
47 C.F.R. §	CTS, IP CTS, IP		Profile which includes Speed Dial & other
64.604(a)(5)	Relay)	N1/A	enhancements.
Privacy Screens	VRS	N/A	This requirement is not applicable to the services
47 C.F.R. § 64.604(a) (6)			being offered.
International Calls Non-	VRS, IP Relay (N/A	N/A	This requirement is not applicable to the services
reimbursable	for TRS, STS CTS,	IN/A	being offered. Sprint IP has procedures in place to
47 C.F.R. §	or IP CTS)		prohibit international usage.
64.604(a)(7)			Franco and a second
ASCII & Baudot	TRS, STS (Waived	Exceeds	Sprint's TRS (TTY) platform supports all
47 C.F.R. §	for CTS, IP CTS)		communication modes generally in use including
64.604(b)(1)	(N/A for IP Relay)		Baudot (domestic & international), ASCII, Turbo
On and of Assured B	TDO OTO OTO ID	E	Code, & Enhanced Turbo Code (E-Turbo).
Speed of Answer &	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint Relay answers at least 85 percent of all
Blockage 47 C.F.R. §	C13, IF Relay		calls on a daily basis within 10 seconds, including abandons. Sprint's systems exceed the P.01
64.604(b)(2)			standard.
Equal Access to	TRS, STS, CTS	Exceeds	Except to the extent the requirements are waived,
Interexchange Carriers	(Waived for IP		Sprint's TRS & CTS platforms support the billing &
(IXCs)	CTS, IP Relay)		rating of toll calls through other carriers.
47 C.F.R. §			
64.604(b)(3)	TD0 0T0 0T0 :5	N4 1 -	One del consedido de consedido de la consedidad de la con
TRS Facilities	TRS, STS, CTS, IP	Meets	Sprint provides mandated services 24/7 using
47 C.F.R. § 64.604(b)(4)	CTS, IP Relay		redundant facilities functionally.
Technology	TRS, STS, CTS, IP	Exceeds	Sprint exceeds the minimum mandatory services &
47 C.F.R. §	CTS, IP Relay	LAUGUG	routinely upgrades its products to increase
64.604(b)(5)			functional equivalency.
Caller ID	TRS, STS, CTS, IP	Meets	Sprint provides Caller ID. If not blocked by the
47 C.F.R. §	CTS, IP Relay		customer, the number of the calling party is
64.604(b)(6)		<u> </u>	transmitted.
STS 711 Calls	TRS, STS (N/A to	Exceeds	Sprint offers multiple solutions to meet this
47 C.F.R. §	CTS, IP CTS, or IP		requirement include: Auto 711 Routing for STS
64.604(b)(7)	Relay)		users connects callers with a Customer Profile
			directly to STS CAs. CAs answering 711 for callers without a profile will immediately transfer
			the caller to a STS CA. Sprint offers a wireless
			short code to STS for Sprint wireless users.
			Sprint's 711 Interactive Voice Response (IVR)
			allows connectivity directly to an STS CA using the
			same level of prompts the IVR uses for other forms
	TD0 076 075	ļ	of TRS.
Consumer Complaint	TRS, STS, CTS, IP	Meets	Sprint maintains 24/7 Customer Service & logs all
Logs & Procedures	CTS, IP Relay		complaints received. Sprint provides the State a
47 C.F.R. §			summary that meets FCC standards.

FCC Minimum Standard	Applies to:	Compliant	Sprint's Approach
64.604(c)(1)	<b>TD0 6-2 2-3</b>		
Contact Persons 47 C.F.R. § 64.604(c)(2)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint's point of contact for complaints is Customer Service at: Sprint Relay Customer Service PO Box 29230 Shawnee Mission, KS 66201-9230 800-676-3777 (English) 800-676-4290 (Spanish)
Public Access to	TRS, STS, CTS, IP	Exceeds	877-787-1989 (Speech to Speech) 877-877-3291 (Fax) Sprint provides innovative Outreach services
Information 47 C.F.R. § 64.604(c)(3)	CTS, IP Relay		through state programs. The FCC does not allow IP Relay providers to include the cost of outreach in their yearly costs. Sprint continues to publicize the availability of IP services through promo materials, on-line marketing, & public service announcements. (Sprint does not include the cost of these activities in its yearly cost submissions to the FCC).
Rates 47 C.F.R. § 64.604(c)(4)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint ensures TRS/CTS users, who rely on Sprint's Relay platforms to establish billing for toll calls, are charged no more than traditional phone users.
Cost Information & Data Submission 47 C.F.R. § 64.604(c)(5)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint contributes to the Interstate TRS Fund & submits the required cost data to the FCC & to the Fund administrator to receive reimbursement.
Whistleblower Notice 47 C.F.R. § 64.604(c)(5)(M)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint has provided copies of the whistleblower protections to all of its employees including instructions for reporting noncompliance to the FCC's whistleblower hotline.
Complaint Resolution 47 C.F.R. § 64.604(c)(6)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint supports timely & effective complaint resolution.
Treatment of Customer Information 47 C.F.R. § 64.604(c)(7)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint does not use Customer Profile data for any purpose other than to process calls & will not sell, distribute, share, or reveal the profile data unless compelled by law. During State Relay transitions, Sprint does provide Customer Profile data at least 60 days prior to transition in usable format.
No Incentives to Use IP CTS 47 C.F.R. § 64.604(c)(8)	IP CTS (N/A to TRS, STS, CTS, or IP Relay)	Meets	Sprint does not offer incentives to IP CTS users directly/indirectly. Sprint prohibits incentives to hearing health professionals & does not have joint marketing arrangements with any hearing health professional.
IP CTS Registration & Certification 47 C.F.R. § 64.604(c)(9)	IP CTS (N/A to TRS, STS, CTS, or IP Relay)	Meets	Sprint complies with the final FCC rule requiring the collection of each new customer's name, address, telephone number, date of birth, & last 4 of SSN. Sprint collects a separate, self-certification for all new IP CTS users. Sprint maintains registration & certification records for at least 5 years after service ceases, & does not disclose registration & certification information, except as required by law/regulation.
IP CTS Default Settings 47 C.F.R. § 64.604(c)(10)	IP CTS (N/A to TRS, STS, CTS, or IP Relay)	Meets	Sprint's default setting for the IP CapTel phone is to have captions on.
IP CTS Equipment Fee & Label 47 C.F.R. § 64.604(c)(11)	IP CTS (N/A to TRS, STS, CTS, or IP Relay)	Meets	Portions of this requirement were struck down at the conclusion of the DC Circuit Court ruling on Sorenson v FCC & no longer applies. Sprint fully complies with the remainders of the order to provide a warning label on all IP CTS equipment & software.
TRS calls requiring multiple CAs 47 C.F.R. § 64.604(c)(14)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint complies for VCO-VCO calls between multiple captioned telephone relay service users, IP CTS/CTS users & IP CTS users; CTS/IP CTS users & TTY users; CTS/IP CTS users & VRS users.

FCC Minimum Standard	Applies to:	Compliant	Sprint's Approach
IP Emergency calling requirements 47 C.F.R. § 64.605	IP CTS, IP Relay (N/A to TRS, STS, or CTS)	Meets	Sprint's emergency calling service is in full compliance with the FCC's rules. For Sprint IP, Sprint handles & routes emergency calls to the applicable PSAP; immediately attempts to reestablish contact in the event of disconnection; automatically places 911 calls at the front of call queues; & obtains registered location info from its users. For IP CTS calls, Sprint provides captioning for emergency calls, & the customer's underlying carrier handles call routing & delivery to/from the PSAP. Sprint provides its users with methods of updating their registered locations.
Internet-based TRS Registration 47 C.F.R. § 64.611	IP Relay (N/A to TRS, STS, CTS, or IP CTS)	Meets	Sprint provides IP users the ability to register Sprint as their default provider. Sprint assigns 10-digit local numbers, routes, & delivers inbound & outbound calls. Sprint updates the TRS Numbering Directory for users who select Sprint as their default IP provider, as required under the FCC. Sprint complies with all porting requirements. Sprint's promo materials include advisories for E911, processes for obtaining a number, number portability, & updating location information.

# **APPENDIX D:**

TRS and STS Training Outlines

## Training

## Communications Assistant (CA) Training

Sprint Accessibility knows a well-trained CA has the skills and tools to provide the best customer experience. The education and continued development of all CAs is an investment. Sprint Accessibility's training has evolved over 26 years in the relay industry, however, Sprint Accessibility's commitment to quality service has never wavered. Sprint Accessibility's reputation as a TRS provider within the deaf, hard of hearing, DeafBlind, speech-disabled communities, and the general public comes from our CAs' commitment to providing quality service.

Training has been developed in coordination and cooperation with the relay user communities. CA trainees must complete a series of scenario-based assessments, culminating in an on-the-job final assessment before graduating from initial training and handling relay calls. Training does not stop after the initial push. Employees continue to receive regular ongoing training to improve their skills and knowledge. Ongoing training and Quality Assurance programs are used as incentives to encourage competition between individual CAs and call centers and encourage continued industry-leading quality.

Sprint Accessibility listens to customers' feedback and takes proactive steps to implement changes to address suggestions and feedback. Sprint does not develop training and consumer education programs for the TRS in isolation. Sprint Accessibility contracts with members of the deaf, hard of hearing, and DeafBlind communities and individuals with a speech disability to jointly develop and present training for TRS. This is an important Sprint Accessibility advantage. Sprint Accessibility provides ongoing training to our CAs on state-specific information including the names of local organizations, cities, and other common terms specific to Puerto Rico. Sprint Accessibility welcomes feedback from Puerto Rico and its end-users.

During initial training, CAs are trained and evaluated on how to accurately reflect the TTY user's intent and the CA's role in the Relay process. Training is provided on various levels of English/Spanish/ASL during initial training and throughout employment. In order to successfully complete initial training, the CA must demonstrate competent skills to translate calls as requested. When training is complete, a CA continues to be evaluated on translation skills through individualized monthly surveys.

Relay trainees are required to pass a valid and unbiased written test to demonstrate that they can correctly interpret typewritten ASL phrases. Trainees must achieve a score of 80 percent or better before being allowed to complete training and process Relay calls.

Sprint Accessibility incorporates various instructional methods to enhance the trainee's ability to learn:

- Lectures
- Visual graphics
- Flow charts
- Videos
- Role-play scenarios
- Simulated on-line call handling
- Observation of live-call handling

Our policies and standards manual has been developed over the past 26 years. Sprint stresses the importance of all Relay policies and procedures at the interview/selection process and continues through initial and ongoing training and is currently being utilized and available for the Sate to review.

An outline of these expectations is provided in the following table. This list is not meant to be a complete source and is subject to change. Please note, CapTel information has been provided in this list.

	POLICY AND PROCEDURE	TOPICS
Orientation	<ul> <li>Welcome and Introductions</li> </ul>	<ul> <li>Internet Services</li> </ul>
	<ul> <li>Introduction to Each Other</li> </ul>	<ul> <li>Product Distribution</li> </ul>
	<ul> <li>Sprint (or Vendor Company)</li> </ul>	<ul> <li>The Sprint Campus (if applicable)</li> </ul>
	Sprint Values	<ul> <li>Telecommunications Relay Service</li> </ul>
	Sprint Corp Overview	What is Relay?
	<ul> <li>History of Sprint Corporation</li> </ul>	<ul> <li>Relay Agent Training</li> </ul>
	<ul> <li>Local Telecommunications</li> </ul>	<ul> <li>Relay - Connect to Your Future Video</li> </ul>
	♦ Wireless	<ul> <li>Observation Guidelines</li> </ul>
		<ul> <li>How a Call Reaches Sprint Relay</li> </ul>
Connecting to Relay	The Role of a Relay Agent	Sprint IP user connects to Agent but wants
	Connecting to Relay	Customer Service
	◆ 711	<ul> <li>Sprint IP Two Line VCO</li> </ul>
	<ul> <li>Dedicated Toll-Free Numbers</li> </ul>	→ Fed IP Relay
	• Equipment	<ul> <li>Fed IP Relay call processing</li> </ul>
	→ TTY	◆ Fed IP Relay Reporting
	TTY Basics	<ul> <li>Fed IP Relay variations</li> </ul>
	TTY Etiquette	Sprint/Fed IP Relay International Calling
	<ul> <li>Closing a Conversation</li> </ul>	<ul> <li>Sprint/Fed IP Variations</li> </ul>
	Agent Responsibility	<ul> <li>Sprint/Fed IP Fast Busy</li> </ul>
		<ul> <li>Sprint/Fed IP 2-Line VCO</li> </ul>
	Call Set Up	<ul> <li>Sprint/Fed IP Conversation Lag Time</li> </ul>
	Call Closing	Sprint/Fed IP Interrupts
	TTY to Voice Closing a Conversation	1
	Operator Role Closure	0 11 1 2 11 11 1 21
	Operator Close Protocol Guide:	
	Disallowed Calls	<ul> <li>Video Relay Service</li> </ul>
	<ul> <li>Glossary of Abbreviations &amp; Terms</li> </ul>	Devices & Pagers     TTV D. I. P. D. I.
	TTY Practice Session	TTY Public Payphone
	<ul> <li>Auto-Corrected Abbreviations</li> </ul>	Sprint National Relay
	<ul> <li>Standard Abbreviations</li> </ul>	Sprint International
	<ul> <li>Typing Variations</li> </ul>	<ul> <li>Inbound international calling</li> </ul>
	<ul> <li>Internet Characters</li> </ul>	<ul> <li>Sprint International Variations</li> </ul>
	<ul> <li>Non-Baudot Supported Characters</li> </ul>	<ul> <li>Non-Standard TTY</li> </ul>
	<ul> <li>Verbatim - Style</li> </ul>	<ul> <li>Outbound International calling</li> </ul>
	Contraction Spelling	<ul> <li>Transfer Menu</li> </ul>
	<ul> <li>Punctuation</li> </ul>	<ul> <li>Reseller call processing</li> </ul>
	Agent/Operator Role	◆ CapTel
	♦ SKSK	<ul> <li>Relay-CapTel</li> </ul>
	Background Noises while TTY user is Typing	<ul><li>CapTel-Relay</li></ul>
	Typing Monetary Units	<ul> <li>CapTel Transfers</li> </ul>
	◆ 711	<ul> <li>Dedicated State CapTel Transfer</li> </ul>
	<ul><li>TTY Garble During Typing</li></ul>	→ Alternate Languages
	<ul> <li>XXX to Correct Typing Error</li> </ul>	<ul> <li>Spanish Language Customer Service</li> </ul>
	Other Communication Devices	Relay Caller ID
	<ul> <li>Data Transmission Speed</li> </ul>	◆ True Caller ID
	Turbo Code	◆ Per Call Block
	Turbo Code     Turbo Code Interrupt	◆ Per Line Block
	Enhanced Turbo Dial Thru - (ETurbo)	<ul> <li>Permanent Call Blocking</li> </ul>
	·	Caller ID Blocking - True Caller ID
	Disable Turbo Code Mode	<ul> <li>Caller 1D Blocking - True Caller 1D</li> <li>Connecting Variations</li> </ul>

	POLICY AND PROCEDURE	TOPICS
	American Standard Code Information	Misdialed Relay Phrase
	Interchange (ASCII)	Dialed 711 Instead of 911
	ASCII Interrupts	♦ 711 Spanish
	Sprint IP - Internet Relay	Request for Relay Numbers
	Sprint IP call processing	<ul> <li>Cellular/Wireless problem reaching 711</li> </ul>
	<ul> <li>Internet Relay variations</li> </ul>	◆ 611/811 (LEC Service Access)
	◆ 'GA' is optional	◆ 700
	<ul> <li>Sprint IP Standard Svc Explanation</li> </ul>	
	Text Flow	g g
	<ul> <li>Interruptions without garble</li> </ul>	Correctional Facility/Prison Calls
	Conversational flow	<ul> <li>Use of Relay through Correctional Facilities:</li> <li>Correctional Facility Call Processing, Relay Abuse</li> </ul>
	ASL Emoticons – Text Message Abbreviations     ID Assessment	Spanish & French Language Service
	IP Acronyms	International calling restrictions
	Sprint IP Variations	◆ Info Digit list
0 1 10 1	911 Emergency Calls	
Overview of System	System Overview	Dial Window
& Equipment	◆ Login/Logout	Scratch Pad
	<ul> <li>Agent Profile</li> </ul>	◆ Transfer Panel
	<ul> <li>Clicking the Mouse</li> </ul>	<ul> <li>Headset Panel</li> </ul>
	<ul> <li>Dragging/Dropping</li> </ul>	Status Bar
	<ul><li>Copy/Paste</li></ul>	Record Feature
	Drop Down Boxes	Function Keys
	♦ Lists	♦ Block
	◆ Radio Button	Ctrl-Switch
	Scroll Bars	◆ Switch
	♦ Sliders	◆ The Keyboard
	• Tables	◆ Alpha Keys
	<ul><li>Accessing a Program</li></ul>	Call Handling Keys
	<ul><li>Screen Displays</li></ul>	◆ Numeric Keys
	1	
	Call Handling Screen     Title Per	Cursor Movement Keys
	Title Bar	Arrow Keys
	♦ Banner	Backspace
	Conversation Area	Error Correction Function
	<ul> <li>Disconnect Message Status</li> </ul>	Single Word Edit Function
	Color Scheme	<ul> <li>Word Substitution Feature</li> </ul>
	<ul> <li>Agent Text Transmission</li> </ul>	<ul> <li>Macros Table</li> </ul>
	Cancel Key	<ul> <li>Ctrl-Function Keys</li> </ul>
	<ul> <li>Information Bar</li> </ul>	<ul> <li>Glossary of Telephony Terms</li> </ul>
	<ul> <li>Profile</li> </ul>	Background Noises
	→ Help	<ul> <li>Voice Tones/Descriptive Words</li> </ul>
	Call Type	<ul> <li>Standard Abbreviations</li> </ul>
Phone Image	Professional Phone Image	Voice Person Speaking in Third Person
(Tone of Voice)	<ul> <li>How phone image is created</li> </ul>	◆ Pacing the Voice Customer
	<ul> <li>Provide warm &amp; friendly greeting</li> </ul>	Brief pacing phrases
	<ul> <li>Conversational Tone</li> </ul>	Repeating information
	<ul><li>Voice Inflection</li></ul>	<ul> <li>Voice Customer does not say "GA"</li> </ul>
	Audibility & breath control	→ Handling Interruptions
	Pitch	Voice Tone
	Quality     Quarter Pale	How Phone Image is Created     Why Convergetional Tanga?
	Operator Role     Palay Pala	Why Conversational Tone?     Transparate Caller Control & Confidentiality
	• Relay Role	<ul> <li>Transparency, Caller Control &amp; Confidentiality</li> </ul>
	• Relay Skills	→ Rudeness
	Conversational Flow	<ul> <li>Create an Exceptional Customer Experience</li> </ul>

	POLICY AND PROCEDU	RE TOPICS
	Staying focused	◆ Announce
	<ul> <li>Listening skills</li> </ul>	◆ Closing
	<ul> <li>Customer service skill</li> </ul>	<ul> <li>Suggested Redirect Phrases</li> </ul>
	<ul> <li>Coping skills</li> </ul>	<ul> <li>Transparency &amp; Caller Control</li> </ul>
	<ul><li>Phrases</li></ul>	Background Noises
	V Tilld3C3	<ul> <li>Voice Tones/Descriptive Words</li> </ul>
TTY-Voice &	TTY to Voice Introduction	·
Voice-TTY		◆ TTY-Voice Busy Signals
V0100 111	Connecting to outbound customer	Regional 800
	◆ Announcement	♦ Voice-TTY
	Explanation of service	♦ Voice-TTY Introduction
	<ul> <li>Deaf or Hard-of-Hearing Explanation</li> </ul>	<ul> <li>Connecting to the outbound customer</li> </ul>
	<ul> <li>International Announcement</li> </ul>	<ul> <li>Voice Greeting</li> </ul>
	<ul> <li>TTY-Voice Procedures</li> </ul>	<ul> <li>Voice call progress</li> </ul>
	<ul> <li>TTY-Voice Specific Person Request</li> </ul>	<ul> <li>Announcement</li> </ul>
	<ul> <li>Variations Specific Person Request</li> </ul>	<ul> <li>Voice-TTY call (Hearing Person Answer)</li> </ul>
	<ul> <li>TTY-Voice Answered TTY</li> </ul>	<ul> <li>Explanation of service</li> </ul>
	<ul> <li>Voice Person Not Available</li> </ul>	<ul> <li>Voice-TTY Procedures</li> </ul>
	<ul> <li>TTY-TTY Call Release</li> </ul>	<ul> <li>Voice-TTY Specific Person Request</li> </ul>
	<ul><li>TTY-Voice Answer TTY (TTY-TTY)</li></ul>	<ul> <li>Voice-TTY Answered Voice</li> </ul>
	<ul> <li>TTY-TTY Specific Person Request</li> </ul>	<ul> <li>Voice-TTY No Answer</li> </ul>
	◆ TTY-Voice No Answer	♦ Voice-TTY Busy Signal
	<ul> <li>Types of Busy Signals</li> </ul>	
	• Redialing	
Branding	<ul> <li>Inbound Answer Type Branding</li> </ul>	Branding procedures
3	<ul> <li>Database Branding</li> </ul>	Prantaling procedures
Recordings,	Introduction	→ AMR
Answering	<ul> <li>Recording Feature</li> </ul>	TTY-Voice Pager/Beeper (known)
Machines, Pagers, &	<ul> <li>Information Line Recording (TTY/ Voice)</li> </ul>	
Answering Machine		
Retrieval (AMR)	Touch Tone Dialing     Hairs Touch Tones (TTV/Maiss)	· ·
	<ul> <li>Using Touch Tones (TTY/Voice)</li> </ul>	◆ Voice-TTY Answering Machine
	Audio text interaction	Other Recording Variations
	<ul> <li>Variations for Recordings</li> </ul>	◆ Voice Mail System
	Record Feature Tips	Privacy Manager/Call Intercept
	<ul> <li>TTY-Voice Recordings</li> </ul>	<ul> <li>Automatic Redial System Recordings</li> </ul>
	<ul> <li>TTY-Voice Recording Information</li> </ul>	<ul> <li>Switchboards</li> </ul>
	<ul> <li>TTY-Voice Answering Machine</li> </ul>	<ul> <li>Redialing Voicemail through Switchboard</li> </ul>
	<ul> <li>Variations: Answering Machine/</li> </ul>	<ul> <li>TTY-Voice Asking for Specific Person</li> </ul>
	Recording/Pagers	<ul> <li>Live person On Answering Machine Redial</li> </ul>
V00	Voice Mail Retrieval	
VCO	<ul> <li>VCO Introduction</li> </ul>	<ul> <li>Reverse 2LVCO Intro</li> </ul>
(Voice Carry-Over)	<ul> <li>VCO Announcement</li> </ul>	<ul> <li>Reverse 2LVCO Procedure</li> </ul>
	<ul> <li>VCO Service Explanation</li> </ul>	<ul> <li>VCO Variations</li> </ul>
	<ul> <li>VCO Equipment</li> </ul>	<ul> <li>VCO comes in Voice Line</li> </ul>
	<ul> <li>Non-Branded VCO</li> </ul>	<ul> <li>2LVCO Conference Calls</li> </ul>
	<ul> <li>Branded VCO</li> </ul>	<ul> <li>VCO Requests Relay to give Relay #</li> </ul>
	<ul> <li>VCO No Answer</li> </ul>	<ul> <li>VCO Privacy while leaving message</li> </ul>
	◆ VCO Busy	<ul> <li>VCO Voice Mail Retrieval</li> </ul>
	<ul><li>VCO Privacy</li></ul>	2LVCO Voice Mail Retrieval
	<ul> <li>VCO Answering Machine</li> </ul>	<ul> <li>VCO Types and Voices</li> </ul>
	<ul> <li>Voice-VCO Answered TTY</li> </ul>	<ul> <li>Inbound Customer Requests VCO/HCO</li> </ul>
	<ul> <li>Voice-VCO Answered VCO</li> </ul>	<ul> <li>VCO Requests CA gives name in notes</li> </ul>
	<ul> <li>Two-Line VCO (2LVCO) Intro</li> </ul>	2LVCO Procedure
Billing		
שוווים	<ul><li>Introduction</li></ul>	<ul><li>Inbound tells wrong #</li></ul>

	POLICY AND PROCEDUR	E TOPICS
	Local call description	◆ Agent dials wrong #
	Paid by Inbound	◆ Marine
	Toll-Free Calls	<ul> <li>Noaming Feature</li> </ul>
	<ul> <li>Calls that Cannot Be Processed</li> </ul>	Restricted Roaming
	◆ Specific Person Request	<ul> <li>Unrestricted Roaming</li> </ul>
НСО	HCO Intro	◆ Voice-HCO Answered
(Hearing Carry-Over)		
(Freating Samp Story	HCO Announcement     HCO Commiss Fundamentals	Voice-HCO Answered TTY (1) (2)  Voice-HCO Research of the control
	HCO Service Explanation	◆ Voice-HCO recorded message answers
	People with speech disabilities "S"	◆ 2LHCO Intro
	Non-Branded HCO	→ Two-Line HCO Procedure
	Branded HCO	♦ Reverse Two-Line HCO
	<ul> <li>HCO with Privacy</li> </ul>	<ul> <li>HCO Variations</li> </ul>
	<ul> <li>HCO No Answer</li> </ul>	<ul> <li>Inbound requests VCO/HCO</li> </ul>
	<ul> <li>HCO Busy</li> </ul>	<ul> <li>HCO User Requests to Speak</li> </ul>
	<ul> <li>HCO-Voice Answering Machine</li> </ul>	
Customer Database	<ul> <li>Enhanced Customer Database Profile</li> </ul>	<ul> <li>Customer Profile Introduction</li> </ul>
	<ul> <li>Household Profile</li> </ul>	<ul> <li>Use/Edit/New/Delete Customer Profile</li> </ul>
	Edit Household Profile	<ul> <li>Verify Customer Password for Agent</li> </ul>
	<ul> <li>Navigating Customer Database</li> </ul>	<ul> <li>Verify Customer Password – CSR Only</li> </ul>
	<ul> <li>Household Profile Panels</li> </ul>	<ul> <li>Customer Profile Panels</li> </ul>
	<ul> <li>Frequently Dialed Numbers</li> </ul>	Personal Information
	<ul> <li>Preferences</li> </ul>	Notes
	• Restrictions	<ul><li>Frequently Dialed #s</li></ul>
	Blocked	• Emergency #s
		◆ STS
	• Emergency Numbers	
	♦ STS	♦ STS Messages
Directory Assistance	◆ STS Messages	Database Profile Macros
Directory Assistance (DA)	◆ DA Intro	Call Processing Calling from International
(DA)	Interstate DA	Number
	Intrastate DA	Sprint International Variations
	<ul> <li>Automated DA</li> </ul>	Non-Standard TTY
	<ul> <li>DA City &amp; State Given; Area Code Unknown</li> </ul>	Answered Foreign Language
	<ul> <li>DA Variations</li> </ul>	Transfer Menu
	<ul> <li>International Transfer Menu</li> </ul>	<ul><li>900 # Call Processing</li></ul>
	<ul> <li>Call Processing Calling Intl</li> </ul>	◆ 211/311/511 Requests
Device-to-Device	Device to Device Intro	◆ VCO-HCO & HCO-VCO
Calls	<ul> <li>Function Keys &amp; Banner Messages</li> </ul>	♦ HCO-HCO
	♦ VCO-TTY & TTY-VCO	<ul> <li>Device to Device Variations</li> </ul>
	◆ VCO-VCO	<ul> <li>Alternate Call Type reaches recording</li> </ul>
	◆ TTY-HCO & HCO-TTY	31
Call Processing	CA information	Request for Length of Call
Variations	<ul> <li>Area Code Only In From Number</li> </ul>	T-V Call & V Requests Supervisor Call Backs for
	Conversational Flow	TTYs
	Static or Poor Connection	Multiple Calls
		Sensitive Topics
	<ul><li>Profanity towards Agent</li><li>Redialing</li></ul>	◆ Suicide
	•	◆ Abuse
	Young Children     Inhound Door Not Connect	Illegal Calls
	Inbound Does Not Connect	•
	♦ Inbound ASCII	Answering Machines     Hange Ha Pefers Macagan Left
	Tone Judgments	Hangs Up Before Message Left     De Net Type December Messages
	Repeating Information	Do Not Type Recorded Messages
	<ul> <li>Restricted Calls</li> </ul>	<ul> <li>Answering Machine Full</li> </ul>
	<ul> <li>Two calling from numbers</li> </ul>	<ul> <li>Change Answering Machine Message</li> </ul>

	POLICY AND PROCEDUR	E TOPICS
	◆ LEC Service Office	VCO Requests Leave Message 1st out dial
	♦ 611/811	<ul> <li>Leaving a Message V-TTY Ans V</li> </ul>
	Double Letters	Retrieving Messages from TTY V Answering
	Call Waiting Feature	Machine
	Conference Calls	◆ TTY Screener
	Party Line Calls	<ul> <li>Request to Leave TTY Message on Answering</li> </ul>
	Three-Way Calling	Machine
	<ul> <li>Hard of hearing customer Answers TTY Line</li> </ul>	<ul> <li>Recordings</li> </ul>
	<ul> <li>Spanish Calls to Spanish Speaking Agents</li> </ul>	Regional 800
	Request for Alternate Language	<ul> <li>TTY Requests "Dial That Number"</li> </ul>
	<ul> <li>Caller Types in Alternate Language</li> </ul>	<ul> <li>Recording with Relay Option</li> </ul>
	<ul> <li>Voice Customer Hangs Up During Call</li> </ul>	<ul> <li>Alternate Call Recording Reached</li> </ul>
	Variable Time Stamp	English/Spanish
	Customer Misdialed Phrase	◆ Pound
	TTY Customer Hangs Up During Call	◆ Touch Tone Phone
	Non Standard TTY Capability	<ul> <li>Advertisements</li> </ul>
	<ul> <li>Relaying Internet Characters</li> </ul>	<ul> <li>Do Not Type Recordings</li> </ul>
1	TTY User Does Not Type GA	Get Live Person/Rep
	<ul> <li>Dispatch Calls – Pizza, Taxi, etc.</li> </ul>	Conversation Being Recorded
	<ul> <li>Dispatch Calis – Pizza, Taxi, etc.</li> <li>Customer Referral Guidelines</li> </ul>	Dial Number from Recorded Announcement
	◆ V-T Calls answered by Fax	◆ VCO
	<ul> <li>Customer Requests</li> </ul>	<ul> <li>Conference Calls</li> </ul>
		<ul> <li>Leave Relay Number</li> </ul>
		♦ Voice Mail Retrieval
		<ul> <li>VCO Types &amp; Voices</li> </ul>
	,	◆ Prompting
	<ul><li>Request Specific Agent</li><li>Agent Knows Customer</li></ul>	Data Transmission Box
	•	Prompting VCO on Hold
	Request for Relay Number      Customer Requests to Call Relay Service	Requests VCO/HCO
	Customer Requests to Call Relay Service     Dequest for Calling From Number	→ HCO
	Request for Calling From Number     Degreet Telephone Number Deferrel	Requests VCO/HCO
	Request Telephone Number Referral     Request for Data/Time	Alternate Call Type Recording
	Request for Date/Time     User Pegusets Agent to Medify Cell	Bridge Left Open
Call Take Over	User Requests Agent to Modify Call     TOO But-	· · ·
Procedures	FCC Rule	VCO
1100044103	Protocol & process flow     TTV Visian and Visian TTV	♦ VCO-VCO
	TTY-Voice and Voice-TTY     ASCU	→ HCO
Customer Service	◆ ASCII	◆ VCO-TTY & TTY-VCO
Customer Service	Functions	→ Procedures
Transparency	Language Services     Non Foregroup College	A Nickword Fellows
Transparency	Non-Emergency Calls     Transparence Courts For southern	Network Failure
Emergency Call	Emergency Center Evacuation	A TTV F TTV C !! D !
Procedures	• Emergency Calls Intro	TTY-Emergency TTY Call Release
1100000103	• Emergency Services	• Internet-Emergency
	FCC Requirements	• Instant Messenger (IM) Emergency
	• Emergency Call Processing	• Emergency Call Processing Variations
	• Emergency Reporting	• Emergency Form
Fodoral Dalari	TTY-Emergency	◆ Voice-Emergency
Federal Relay Service	FedRelay Intro	FedRelay Confidentiality Policy
JCI VICE	FedRelay Announcement	FedRelay Customer Information Requests
	FedRelay Service Explanation	FedRelay Customer Contacts
	FedRelay Procedures	<ul> <li>FedRelay Reporting</li> </ul>
	<ul> <li>FedRelay call types</li> </ul>	

	POLICY AND PROCEDURE	TOPICS
STS (Speech-to-	STS Introduction & History	Ways to Reduce/Streamline Notes
Speech)	STS Description	<ul> <li>Standard Abbreviations (STS)</li> </ul>
	Disabilities	STS-Voice
	<ul> <li>Characteristics of STS users</li> </ul>	♦ Voice-STS
	<ul> <li>Stereotypes</li> </ul>	STS VCO-Voice
	<ul><li>Clarifying Phrases</li></ul>	<ul><li>Voice-STS VCO (TTY answer)</li></ul>
	Phrases to Avoid	<ul><li>Voice-STS VCO (VCO answer)</li></ul>
	STS Phone Image	• STS VCO 2 Line VCO
	◆ STS Agent Tools	TTY-STS
	<ul><li>Consistency</li></ul>	◆ STS-TTY
	Patience	Non-branded HCO-STS
		STS-HCO
	Ask Yes/No Questions     No Personal Conversation	
	No Personal Conversation     Dhread	STS Hold Message     STS Call Takening
	Phrases     CTC Alphabat	STS Call Takeover     Confidentiality & Transporter
	STS Alphabet     To the state of the st	Confidentiality & Transparency
	<ul> <li>Transparency/Call Control/ Confidentiality</li> </ul>	Personal Conversations requests
Haaliba Dataabaaaa		STS Variations
Healthy Detachment	<ul> <li>Healthy Detachment Intro</li> </ul>	<ul> <li>Perception</li> </ul>
	<ul> <li>Objectives</li> </ul>	<ul> <li>Ways to Reduce Stress</li> </ul>
	Survival Skills	<ul> <li>Hospitality</li> </ul>
	Relay Traps	♦ Phrases
Healthy Relay	<ul> <li>Introduction</li> </ul>	<ul> <li>Setting up Workstation</li> </ul>
	<ul> <li>Objectives</li> </ul>	<ul> <li>GUAM - Get Up and Move</li> </ul>
	<ul> <li>Ergonomics</li> </ul>	<ul> <li>Ergonomic Relief</li> </ul>
	<ul> <li>Stretching Exercises</li> </ul>	<ul> <li>Slowing the Customer Down</li> </ul>
	Agent Reinforcement	<ul> <li>Overtime</li> </ul>
	Ergonomic Review	<ul> <li>Relaxation</li> </ul>
Adult Learner	Understanding the Needs of the Adult Learner	→ Modeling
	The Learning Continuum	<ul> <li>Checking For Understanding</li> </ul>
	<ul> <li>Use of Different Modalities</li> </ul>	<ul> <li>Guided Practice</li> </ul>
	Edgar Dale's Cone of Experience	<ul> <li>Independent Practice</li> </ul>
	Elements of Lesson Design	Summary
	♦ Focus	• Evaluation
	Objective & Purpose	<ul> <li>How to Give Effective Instruction</li> </ul>
	◆ Input	<ul> <li>Questioning Guidelines</li> </ul>
	<ul><li>Trust in Management</li></ul>	<ul> <li>Feedback - Training &amp; Coaching Technique</li> </ul>
Assessing	The Assessment Process in Training	Acceptable Time Frame
Performance	Assessment - What is involved?	<ul> <li>Acceptable Is Relative</li> </ul>
	Practice Time	<ul> <li>Ways to "Coach"</li> </ul>
	Spelling Test	Feedback
	Written tests	<ul> <li>Maintain Self-esteem &amp; Motivate</li> </ul>
	<ul> <li>Side by side evaluations</li> </ul>	Pass/Fail Guidelines
	◆ Typing	Introduce Assessment Form     Form Set Up
Introduction to		Form Set-Up
Introduction to Diversified Culture	Introduction to Diversified Culture	<ul> <li>Why is there Deaf Culture?</li> </ul>
Diversined Outland	Diversification	<ul> <li>What Do You Know About Deafness</li> </ul>
	♦ Who Uses Relay	Myths About Deafness
	Understanding Our Customer	Two Views of Deafness
	<ul> <li>Special Communication Needs</li> </ul>	<ul> <li>Loudness Levels</li> </ul>
	<ul> <li>Pathological vs. Cultural View of Deafness</li> </ul>	<ul> <li>Characteristics of Deafness</li> </ul>
		<ul> <li>The Deaf Community</li> </ul>
Deaf Heritage	<ul> <li>History in Europe</li> </ul>	<ul> <li>Edward Miner Gallaudet</li> </ul>

	POLICY AND PROCEDURE	TOPICS
	History in North America	Oral/Combined Debate
	Alexander Graham Bell	Timeline of Deaf History
The Deaf Community	<ul> <li>Introduction to the Deaf Community</li> </ul>	American Athletic Association of the Deaf
	National Association of the Deaf	<ul> <li>National Theatre of the Deaf</li> </ul>
	<ul> <li>Contributions to Society</li> </ul>	Assistive Devices
	Mainstreamed Schools	<ul> <li>Gaining Acceptance in the Deaf Community</li> </ul>
	Sign Language Interpreters	<ul> <li>Changes in the Deaf Community</li> </ul>
	Different Communication Systems	<ul> <li>Working with a Sign Language Interpreter</li> </ul>
	Exposure to English	<ul> <li>Interpreting Standards</li> </ul>
	DEAF President Now	Equal Access
	<ul> <li>Attitude Changes toward the Deaf Community</li> </ul>	Cochlear Implant Controversy
ASL Pt. 1	What is ASL?	Rules of ASL
	History of ASL	<ul> <li>Five Parameters of ASL</li> </ul>
	ASL Recognized as Language	English vs. ASL Idioms
ASL Pt. 2	Evolution of ASL	Translate ASL to English and Vice Versa
	ASL Syntax	_
TTYPhony & TTY	First Teletypewriter	TTY Courtesy
Courtesy	<ul> <li>Evolution &amp; History of the TTY</li> </ul>	<ul> <li>Development of Relay Service Market</li> </ul>
	Telecom Laws of Accessibility	
Deaf Customers	Statistics from NIDCD	Relaying for Deaf Customers
Hard of hearing &	Characteristics of Deaf Customers	Establishment of Hearing Loss Association of
Late-Deafened	<ul> <li>Assistive Devices for Deaf Customers</li> </ul>	America
Customers	<ul> <li>Establishment of Assoc. of Late-Deafened</li> </ul>	<ul> <li>Deaf Seniors</li> </ul>
	Adults	<ul> <li>Military Veterans</li> </ul>
		<ul> <li>Relaying for Late-Deafened Customers</li> </ul>
DeafBlind Customers	<ul> <li>What Does DeafBlind Mean</li> </ul>	<ul> <li>DeafBlind Pacing – Allows the CA to slow down the</li> </ul>
	<ul> <li>Assistive Devices for the DeafBlind</li> </ul>	transmission to the Braille machine
	<ul> <li>Relaying for the DeafBlind</li> </ul>	
Relaying for Speech/	<ul> <li>Speech-Challenged Customers</li> </ul>	Traumatic Brain Injury
Cognitively Disabled Customers	<ul> <li>Assistive Devices</li> </ul>	<ul> <li>Stroke</li> </ul>
Customers	<ul> <li>Physically &amp;/or Cognitively Challenged</li> </ul>	<ul> <li>Communication Related Effects</li> </ul>
	Customers	
Relaying for Hearing Customers	<ul> <li>Statistics</li> </ul>	
Ethics &	<ul> <li>Interpreting Standards</li> </ul>	<ul> <li>TRS Rules – Operator Standards</li> </ul>
Confidentiality	<ul> <li>ADA &amp; FCC regulations for the Provision of</li> </ul>	<ul> <li>Relay Center Agreement Regarding Confidential</li> </ul>
	TRS	Customer Info
	Regulations pertaining to call content	

## On-Going Quality Focus Skill Training

Continuous skill training is the cornerstone of Sprint's training program. Core relay processing skills are continually reinforced throughout employment and as a part of supplemental training programs. Sprint develops skills training programs and on-going training labs to ensure skills are maintained and remain consistent with basic relay training. Refresher training is provided on correct relay procedures including system navigation, standard procedures, professionalism, and ethics. Depending upon the complexity of the training a decision is made to determine the appropriate delivery. Our on-going skill training program includes:

- Quality Focus Skill training monthly
- Diversified Culture Awareness training monthly
- Customer Service Initiative monthly
- Check for Understanding monthly

## Grammar and Spelling Rules - bi-annual

Quality Focus Skill Training topics from 2016/2017:

Skill Trailling topics from 2016/2017.
Dialing the correct number within 5 seconds
Typing the Voice/TTY greeting verbatim, Announcement protocol including a prompt state-specific
announcement/greeting used/ ID number given
Call processed according to procedures, specifically following Customer Note instructions
State-specific announcements/greeting/ID given, Call closing protocol, Appropriate closing and
macro for call type
Specific person request announcements, Progress of call/Customer Informed
Call transfer procedure, Adapting to call procedures changes as directed by the customer.
Typing greeting verbatim, Typing message verbatim, Voicing the complete message
Maintaining transparency maintained, Typing messages verbatim
Dialing efficiency and protocol
Typing/reading voice/device answer greetings verbatim, Call closing procedure, Relay mode closing
protocol, Operator mode closing protocol
Changing call procedures as directed by customer, Appropriate macros use., Non-branded VCO call
type setup
Call type standard procedure, Modifying call procedure as directed by the customer, Transferring
(711 customer request)
Dialing the correct number within 5 seconds
Determining familiarity with relay services, Call type appropriate service explanations, Appropriate
macro use (EXPLAINING RELAY)?
Following customer note and customer typed Instructions
Announcement protocol including a prompt state-specific announcement/greeting used/ID number
given, Call closing protocol, Appropriate closing and macro for call type.
Specific person announcement procedure
Call transfer procedure, Adapting to call procedures changes as directed by the customer, 711
transfer compliance

# Ongoing Diversified Culture Awareness Training

Training continues to bring focus to serving relay customers and disability awareness. Sprint provides additional training in Diversified Culture in conjunction with each state's local deaf, hard of hearing, Deafblind, late deafened, and speech-disabled communities to identify knowledgeable presenters to promote ongoing training. These resources, in coordination with trainers ensure all materials presented are appropriate to continuing to broaden employees' understanding and effectiveness. Sprint will utilize live presentations, videos, audio recordings, role-plays, group activities, written materials, and/or discussion groups to deliver ongoing Diversified Culture training. As a part of ongoing Diversified Culture Training, each employee is required annually to review the ethics and confidentiality requirements and sign an agreement of understanding.

Diversified Culture Awareness Training topics from 2016/2017:

Diversified Co	mure Awareness Training topics from 2016/2017.
Jan 2016	Diversified Culture-What's That? Diversification in Communication, Considerations, Who uses the
	relay service? Why is it important for us to understand our customers? Why is it important for us to
	recognize their special communication needs?
Feb 2016	The History of Deafness
Mar 2016	Ways to Detach
Apr 2016	Deaf Nation Expo is
May 2016	American Sign Language is, CODA means
June 2016	All About CapTel, How it works
July 2016	Baseball Signs originated from Sign Language
Aug 2016	Accessibility for All, Sprint corporate responsibility
Sept 2016	Diversity-Equality-Inclusion

Oct 2016	Disability is Diversity, Stretches to do at your desk
Nov 2016	Disability Awareness
Dec 2016	Disability Advocacy
Jan 2017	View of a person's abilities
Feb 2017	Highlight: Edward Verne Roberts – American Disability Activist
Mar 2017	Disability Awareness
Apr 2017	Parkinson's Awareness Month
May 2017	Limb Loss Awareness Month

The following is an example of the monthly Quality Focus Check for Understanding from March 2017.

# Check For Understanding Quality Focus March 2017

Please return to your supervisor by March 7, 2017.

Nar	me Supr	ervisor
1)	meSupe What is the first thing an agent should look at	when a call comes to their station?
2)	If a customer requests that the agent verifies t should type or say something like,	the Calling To number before dialing out the agent
3)	The IP Call number to dial is entered by the in	abound, therefore you DO NOT need to verify the call, even if it's in the Customer Notes to do so. FALSE
4)	The record feature may be used on conferenc TRUE	e calls. FALSE
5)		a preference or instruction the agent should not at the customers the agent to type the
6)	If a device user requests that you do not anno a) Not identify that this call is through a r relay call before.	relay service or ask if the voice person has had a
	<ul> <li>Inform the customer they must answe CALL ANNOUNCED Q) GA.</li> </ul>	r the question (HOW WOULD YOU LIKE YOUR
7)	c) Inform the caller they are required to a What is the purpose of the customer notes?	announce the call.
-	a) To assist the agent in processing the call it     b) To annoy the operator.	how the customer prefers.
	c) To ensure the customer does not have to	repeat their instructions before every call.
8)	d) Both A and C. When using <alt .="">, agents should send it:</alt>	
•	a) Only once and then pause a few moments	s before sending it again.
	b) Twice and then pause a few moments before sending it again.	
	<ul> <li>As many times as they want since they are phone is answered.</li> </ul>	e in the buffer and can be canceled when the
TY/A	ASL Refresher	Provide examples of how to relay the statements
TIME	E WHAT Q	
20.5	PARTY VOLLO	

**Customer Service Initiative (CSI) program:** A discussion of support techniques to enhance service for customers and an avenue for sharing relay agent peer to peer suggestions toward accomplishing superior service. 2016/2017 CSI topics are provided in the following table.

Jan 2016	Use of "Deaf/hard of hearing" and/or "internet service" in announcements.
Feb 2016	Outdial time, Inappropriate use, Veterans and hearing loss
April 2016	Sprint IP go ahead, Keeping the caller informed, Facilitate communication
May 2016	Procedure for recordings, Chemotherapy and hearing loss
Jun 2016	Caller control, Keeping the caller informed, Announcements, FCC verbatim requirement, State
	requirement call customization request
Jul 2016	Solicitation for agent process improvement suggestions, Caller control
Aug 2016	Call closure, Equal communication access
Sep 2016	Call processing reference information, Sprint Relay customer care, Speed of service recognition
Oct 2016	Brief service explanations, Call handling tips from agents
Nov 2016	Customer commendations, States and capitals review
Dec 2016	System enhancement prioritization
Jan 2017	Customer instructions, FCC call take over rule, Transparency
Mar 2017	Transparency, Caller control
Apr 2017	Customer notes, Operator/Relay mode, Call handling tips from agents
May 2017	Stress management

The following is an example of our bi-annual Grammar and Spelling Rules from 2016/2017.



Homonyms (also called homophones) are words that sound like one another but have different meanings. Some homonyms are spelled the same, like bark (the sound a dog makes) and bark (the outer layer of a tree trunk).

#### I and Me Usage

 	me osage		
	when to rise	Example Sentence	HOW to test:
_	when you're reterring to the subject of a sentence or clause	Julia (subject) and / (subject) always go together.	To know if you should use "" or "me" take the other pronoun out of the sentence and see if it still makes
Me	when you're reterring to the object of a sentence or clause	will you (subject) be coming with me (object) to the store?	sense.

#### Examples:

ī

Harry and I/ me went to the store.
Test: Me went to the store (incorrect!)
Test: / went to the store. (Correct!)

Jake invited Brian and I/ me over for dinner.
 Test: Jake invited / over for dinner. (incorrect!)
 Test: Jake invited me over for dinner. (Correct!)

#### Me

 Will you take my brother and time to the movies? Test: Will you take / to the movies? (Incorrect!)
 Test: Will you take me to the movies? (Correct!)

Sam, Jennifer, and I/me went to the beach.
 Test: //le went to the beach. (Incorrect!)
 Test: / went to the beach. (Correct!)

There, Their, and They're Usage

pronounced the same	winen to use	HOW TO TEST
I nere	Naming a place, a thing, or the existence of something	ir you can replace "there" with "nere" you have it right!
Ineir	Snowing possession	if you can substitute their with four you have it right!
i ney re	Compining the words "they" and "are"	"I ney" is a pronoun and "are" is the verb. If you can substitute "We are" you have it right!

Have and Has Usage

	Singular	Plural	Hint
7" Person	I nave	we nave	"Have" and "nas" are both present tense conjugations of the verb "to have", and we use
2~ ⊬erson	You nave	You nave	"have" or "has" depending on the subject.  If the subject is 3° person singular, then you
3~ ⊬erson	He/ Sne/It nas	iney nave	"has". All other subject take on "have".

#### It's and Its Usage

 	and its osuge			
	when to rise	How to rest	How to rest	
lt's	when you're about to describe something	неріасе with "it is"	ir you can replace hits: with hit is: you have it right! Otherwise do not use punctuation.	
lts	when you want to indicate ownership of something	Replace with another possessive adjective ("her," "his," "their") or "the"	oc panocasion.	

Ten Common Spelling Rules

Rule	Examples	Memorize
1. 'ie' or 'ei' Write i before e, except after c Write is after c for words with a sh sound. Write ei when the vowels sounds like an a as in 'weigh'	O achieve, believe, friend receive, receipt, perceive O ancient, efficient, sufficient, conscience Oneighbor, vein, reign, rein, deign	Exceptions: Words like counterfeit, either, neither, height, leisure, forfeit, foreign, science, species, seize, weird
2. 's' or 'es'  9 Add es if a word ends in ch, sh, ss, x or z  9 Add es for most words ending in o	Oarch > arches, clash > clashes, class > classes, box > boxes, quiz > quizzes Otomato > tomatoes, hero > heroes, go > goes, do > does, edho > echoes	Exceptions: Words like altos, duos, pianos, radios, solos sopranos, studios, videos, typos
3. 'y' to 'i' or not  ● For words ending in y preceded by a vowel, retain the y when adding s or a suffix.  ● For words ending in y, retain the y when adding ing.  ● For words ending in y, preceded by a consonant, change the y to i before any other suffix	On try > conveys, employ > employer  try > trying, justify > justifying, certify > certifying, study > studying try > bried, justify > justifies, certify > certifiable, mystify > mystified, laboratory > laboratories	Exceptions: Words like dryness, shyness
4. drop the final 'e'  DROP the e when the suffix starts with a vowel.  DROP the e when the word ends in dge.  DROP the final e when adding -ing	O save > savable, use > usable Ojudge > judgment O save > saving, manage > managing, trace > tracing, emerge > emerging	Exceptions: DO NOT DROP the elif the word ends in ce or ge (e.g. manage > manageable, trace > traceable)
5. 't' or 'tt' when adding -ing, -ed and some suffixes to verbs  DOUBLE the t for verbs of one syllable with a single vowel, or a short vowel sound.  DOUBLE the t for verbs of more than one syllable when the stress is on the last syllable.	Orot > rotting, rotted, rotten fit > fitting, fitted knot > knotting, knotted Oabet > abetting, abetting allot > allotting, allotted commit > committing, committed emit > emitting, emitted forget > forgetting, forgotten (but forgetful)	Exceptions:  DO NOT DOUBLE the f for verbs of one syllable with a double vowel or a long vowel sound (e.g. treat > treating, treated; great > greating, greated)
6. 'r' or 'rr' when adding -ing, -ed and some suffixes to verbs  DOUBLE the r for verbs of one syllable when the final r is preceded by a single vowel.  DOUBLE the r for words of more than one syllable when the stress does not fall on the first syllable.	Ostar > starring, starred, starry tar > tarring, tarred war > warring, warred (but warfare) scer > scarring, scarred stir > stirring, stirred Oconcur > concurring, concurred, concurrence ocour > occurring, occurred, occurrence defer > deferring, deferred, (but deference) deter > deterring, deterring, deterrent inter > inferring, inferred, (but inference) prefer > preferred, preferring, (but preference) refer > referred, referring, referred	Exceptions:  DO NOT DOUBLE the r for verbs of one syllable when the final r is preceded by a double vowel (e.g. fear > fearing, feared)  DO NOT DOUBLE the r for word of more than one syllable, when the stress falls on the first syllable (e.g. prosper > prospered, prospering)
<ol> <li>"L" or "I" when adding -ing, -ed and some suffixes to verba DOUBLE the I when it is preceded by a single vowel.</li> </ol>	cancel > cenceling, cancelled, cencellation fulfil > fulfilling, fulfilled, fulfillment level > levelling, levelled brevel > travelling, travelled, braveller /braveler	Exceptions: DO NOT DOUBLE the / when it is preceded by a double vowel (e.g. conceal > concealing, concealed)

# Staff Training

Our entire Accessibility team exists for our customers. Training on all aspects of ASL, deaf culture, the needs of hearing, speech and dual sensory impaired users, ethics and confidentiality is vital to our success. These topics and others help us to be able to meet and exceed customer expectations and requirements.

All Sprint employees are required to take ethics and confidentiality training. The Sprint Code of Conduct is applicable to Sprint employees and its controlled subsidiaries, the Sprint Board of Directors and anyone we authorize to act on Sprint's behalf. The Code establishes the basic foundation of Sprint's ethics by communicating our philosophy and commitment to all of our employees, customers, other stakeholders, and the communities in which we do business. The Sprint Code of Conduct outlines our ethical and legal responsibilities as employees, as well as our interactions with customers, competitors and suppliers. One of our most valuable assets is our

reputation for honesty and fairness, and our commitment to uphold this responsibility. The Code is a go-to resource when questions of legal or ethical appropriateness arise. We are bound by the Code and the specific operational policies of Sprint. Annual Code certification is required. Sprint also maintains an Ethics Helpline, a 24-hour resource for employees and other stakeholders to confidentially and safely seek advice or report any suspected violation of the Code of Conduct, such as fraud, sexual harassment, discrimination, or any illegal conduct in the workplace.

Sprint staff members are also required set annual corporate training and development goals. Individual performance is measured and tied to compensation. Ongoing Staff Development is also key to overall staff performance. Sprint's Accessibility Customer Solutions (ACS) group hosts an interactive meeting called the Sprint Accessibility Café. This monthly meeting is an opportunity for the Accessibility Team to share market and industry product updates. Presenters from outside the group and subject matter experts from the Relay industry also provide updates.

# **APPENDIX E:**

**TRS Pledge of Confidentiality** 

## TRS Pledge of Confidentiality

Sprint's reputation as an ethical company is the key to enabling us to be the preferred communications company – a place that delivers the best experiences for employees, end users, and state customers. Throughout initial and on-going training, communications assistants (CAs) receive information and guidelines on professional conduct with an emphasis on ethics and confidentiality, based on Sprint's "Relay Center Code of Ethical Conduct" and "Principles of Business Conduct." CAs are presented with possible situations involving ethical issues and are taught how to apply the conduct guidelines to each situation.

All Relay center personnel are required to sign and abide by a pledge of confidentiality that promises not to disclose the identity of any caller or any information learned during the course of relaying calls. In conjunction with signing Sprint's confidentiality agreement, as a part of training, CAs role-play various scenarios which teach the correct way to ask for assistance from a supervisor without divulging call-specifics. Examples of confidentiality breaches are reviewed and discussed with the CAs.

Sprint strictly enforces confidentiality policies in the center, which includes the following:

- Prospective employees are screened during the interview process on issues regarding ethics and confidentiality.
- On day one of training, employees must sign a Pledge of Confidentiality Agreement Form.
- During initial training, employees are presented with examples of potential breaches of confidentiality.
- Stress can be a factor in maintaining confidentiality. CAs receive three hours of training on healthy detachment.
- After graduation from initial training, employees are reviewed yearly on the Pledge of Confidentiality and are required to re-sign promises not to disclose the identity of any caller or any information learned during the course of relaying calls.
- Breach of confidentiality may result in termination of employment.
- All Sprint Accessibility Centers have security key access.
- Visitors are not allowed in work areas.

#### Sprint Code of Conduct

The Sprint Code of Conduct describes the ethical and legal responsibilities of employees of Sprint and anyone we authorize to act on Sprint's behalf. Sprint and all TRS employees (including Communication Service for the Deaf [CSD] staff) are required to annually certify that they understand and will comply with the established code of conduct. The certification tool and process requires employees to affirm their understanding and compliance of Code of Conduct expectations regarding Ethics, Inclusion and Diversity, Information Security, Insider Trading, Privacy, Records Management, Safety and Preparedness, and Time Reporting. The section on Ethics includes a Helpline for employee resources allowing them to confidentially and safely seek advice or report compliance violations.

The Sprint Code of Conduct covers all the serious concerns of a whistleblower policy, which is intended to encourage and enable employees and others to raise questions/concerns and seek resolution. It is explicitly stated in the Sprint Code of Conduct all employees and others are obligated to report violations or suspected violations. Additionally, Sprint has an explicit retaliation policy in which an employee who retaliates against someone who has reported in good faith or assists in an investigation may be subject to corrective action up to and including termination. This information is contained within Sprint's Code of Conduct all employees are required to complete annually.

There is a TRS whistleblower protection notification posted at Sprint TRS call centers in accordance with FCC rules. CSD also obtains a signed acknowledgement of the receipt of the Whistleblower Policy from all employees upon hire, and annually thereafter.

### Training on Ethics

Sprint Accessibility employees receive training on the appropriate protocol to protect relay users' privacy and how to prevent the unintentional disclosure of relay communications. When trainees observe calls and ask questions once back in the training room, trainers lead a discussion on the appropriate method to seek clarifications without divulging confidential information. CAs may also role-play various scenarios which demonstrate the correct way to request assistance from a supervisor without divulging call-specifics. Examples of ethical issues and challenging circumstances are reviewed and discussed with CAs. During initial training, CAs are required to pass a series of written and skills-demonstration tests, which include their understanding of the Relay Center Code of Ethics and how to apply the Code to hypothetical situations. Trainees who do not pass these tests are not utilized as CAs.

Sprint's high-performance culture focuses on accountability, first and foremost, along with open communication and innovation. Within these traits, integrity and ethics are critical success factors. Amidst unprecedented change and technological advancement, acting with integrity is not just the right thing to do; it is the unwavering foundation for Sprint.

## Confidentiality

Sprint Accessibility believes measures to ensure confidentiality are crucial to the success of TRS operations and has implemented procedural and environmental measures to safeguard customer and call information. Sprint has policies in place to protect users' confidentiality. These policies establish high standards for ethical behavior and employees are subject to disciplinary action, including termination of employment, for violating ethical and confidentiality standards.

Sprint employees receive training on confidentiality and ethics. Employees are trained to understand why confidentiality is important, how to protect confidentiality, the appropriate protocol to protect relay users' privacy, how to prevent the unintentional disclosure of relay communications and the consequences of not following all confidentiality requirements. CAs are taught using various scenarios which demonstrate the correct way to request assistance from a supervisor without divulging call-specifics. Annually, all TRS call center staff receives re-training which includes items such as confidentiality, ethics, and inclusion and diversity. All CAs annually sign a confidentiality agreement to maintain confidentiality.

Confidentiality is reinforced through our CAs' participation in an interactive training program focusing on scenarios they are likely to encounter when relaying calls.

Correct Ways to Protect Confidentiality	Examples of Breaches of Confidentiality
To make a generic comment about calls: "Boy – long calls	Talking about the specific length of a call. For example, saying to
really wear me out."	another agent, "You know that call I took over for you? It lasted 84 minutes!"
To share general observations about calls: Example, "I'm noticing a lot of HCO calls lately."	Talking about specific callers. Example, "I relayed a call for Miss Deaf America." Or "I had that VCO user from Florida again this morning."
It is appropriate to respond to a customer's comments with a brief "thank you" or something to that effect without elaboration. Maintain a professional and friendly image with customers.	The agent should never say to a customer: "I remember you from a previous call – how are you doing?" Phone lines do not talk to voice telephone users; it is the same with relay customers.
It is appropriate to discuss with a member of management technical or procedural components of a call. For	It is not appropriate to discuss call content or conversations with others, ever.

Correct Ways to Protect Confidentiality	Examples of Breaches of Confidentiality
example, to say you had problems placing a calling card	
call from a pay phone.	
It is appropriate to call for a Supervisor to look at your	It is not appropriate to request assistance from the agent sitting
screen for assistance with the call.	next to you.

All relay center personnel are required to sign and abide by the Sprint Relay policy for confidentiality. These confidentiality expectations are strictly enforced and employees are expected to comply with this policy during and after their period of employment. The relay center Code of Ethics requires the following:

- Keep all TRS call-related information strictly confidential.
- Keep no records of customer information or content of any TRS call.
- Refrain from editing or omitting anything from the content of the conversation or the spirit of the speaker.
- Refrain from adding or injecting into the content of the conversation or the spirit of the speaker.
- Assure maximum customer control.
- Strive to further skills and knowledge through training, workshops, and reading literature available in the field.

In accordance with the FCC, all information utilized for call set up, including customer database and preferred call type information remains confidential and cannot be used for anything but the call. Once the inbound party disconnects, all information pertaining to that call disappears from the CA's terminal. The required confidentiality and security of the customer preference data is covered during training of all employees and reinforced throughout employment. Sprint takes the following steps to ensure Customer Profile information remains secure:

- Sprint does not modify a customer's record based on experience.
- All Customer Profile database entries contain time and date stamps and note the identification number of the CA who processed the request.
- Relay users register a username and password/PIN. Sprint also asks customers to register
  a security question and answer only known to them in case the username and password is
  lost or forgotten.
- Sprint's Customer Profile information is encrypted and protected from outside access by firewalls.

#### Sprint Confidentiality Form

IN CONSIDERATION of: (1) my employment with Sprint or any subsidiary, affiliate, or successor-in-interest of Sprint Corporation, (2) my continued employment as long as mutually agreeable, and (3) the opportunity to receive Sprint confidential customer information or other good and valuable consideration:

AS AN EMPLOYEE OF THE RELAY SERVICES ORGANIZATION, I UNDERSTAND THAT I AM BOUND BY ALL SPRINT POLICIES AND SPECIFICALLY, I AGREE AS FOLLOWS:

- 1 ALL TELECOMMUNICATIONS RELAY SERVICE (TRS) CALL RELATED INFORMATION SHALL BE KEPT STRICTLY CONFIDENTIAL. I will not reveal any information acquired during or observing a relay call. I will only discuss call-related questions or problems with management or Human Resources. I agree to keep confidential all information I learn in my position for the duration of and after my employment with Sprint ends.
- NO RÉCORDS OF CUSTOMER INFORMATION OR CONTENT OF ANY TRS CALL SHALL BE KEPT BEYOND THE DURATION OF THE CALL, WITH LIMITED EXCEPTIONS FOR AUTHORIZED COMPANY PROCEDURES. I will not keep a record of any customer information or conversation content beyond the duration of the call except in accordance with company procedures for relaying Speech to Speech calls or for billing and customer profile purposes. I will destroy all such records in my possession immediately upon completion of their authorized use.
- 3 NOTHING MAY BE EDITED OR OMITTED FROM THE CONTENT OF THE CONVERSATION OR

- **THE SPIRIT OF THE SPEAKER**. I will transmit exactly what is said in the way that it is intended in the language of the customer's choice.
- 4 NOTHING MAY BE ADDED OR INTERJECTED INTO THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER. I will not advise, counsel, or interject personal opinions, even when asked to do so by the customer.
- 5 TO ASSURE MAXIMUM CUSTOMER CONTROL, I WILL BE FLEXIBLE IN ADAPTING TO THE CUSTOMER'S NEEDS.
- 6 I WILL STRIVE TO FURTHER MY SKILLS AND KNOWLEDGE THROUGH CONTINUED TRAINING, WORKSHOPS, AND READING OF CURRENT LITERATURE IN THE FIELD.
- 7 ALL SPRINT MATERIALS IN MY POSSESSION PERTAINING TO ANY SPRINT CUSTOMER WILL BE DELIVERED UPON THE TERMINATION OF MY EMPLOYMENT.

I have read and understand the Sprint Relay Center Agreement Regarding Confidential Customer Information. I agree to comply and understand that failure to do so will lead to company disciplinary action that may result in my termination and/or criminal prosecution. I also understand that ascertaining damages resulting from a breach of this agreement would be difficult. I agree that Sprint shall have the right to an injunction against me, enjoining any such breach without any obligation to post bond. I agree that this will be in addition to and without limiting any other remedies or rights Sprint may have against me.

#### **EMPLOYEE SIGNATURE AND DATE**

#### MANAGER/SUPERVISOR SIGNATURE AND DATE

## Sprint Federal Confidentiality Form

The Federal Relay provides a transparent link of telecommunication between typed/signed/voice (disabled) and voiced (non-disabled) messages. As part of the relay services organization all employees and subcontractors are bound to the following rules and regulations:

- All Federal Relay call related information is to be strictly confidential.
- Nothing is to be edited or omitted from the content of the conversation or the spirit of the Federal Relay user.
- Nothing is to be added or interjected into the content of the conversation or the spirit of the Federal Relay user.
- To assure maximum user control, the employee will be flexible in adapting to the caller's needs.
- Employees and subcontractors will strive to further competency in skill and knowledge through continued training, workshops and reading of current literature in the field.

#### ~ Employee and Subcontractor Role ~

- 1) The employee or subcontractor shall not disclose the content of any relayed conversation with the exception of resolving issues with supervisors regarding customer complaints.
- 2) The employee or subcontractor is prohibited from identifying the name of any caller. The employee or subcontractor shall not reveal or act upon any information obtained from the caller while relaying calls, except to resolve issues regarding complaints that are handled through the supervisors.
- 3) The employee or subcontractor shall not discuss the specifics of any call relayed (even for training purposes) with coworkers, counselors, or other support services. Nor shall specifics be discussed with supervisors except to resolve issues regarding complaints.
- 4) Any Federal Tax Return information [as defined in Internal Revenue Code (IRC) 6103 (b)(1),(b)(2)] made available shall be used only for the purpose of carrying out the provisions of the Federal Relay contract. Information contained in such material shall be treated as confidential and shall not be divulged or made known in any manner to any person except as may be necessary in the performance of this contract. Disclosure to anyone other than an authorized employee or subcontractor of Sprint shall require prior written approval of the Internal Revenue Service (IRS). Requests to make such disclosures should be addressed to the GSA Contracting Officer.
- 5) Return information disclosed to an employee or subcontractor can be used only for a purpose and to the extent authorized within the Federal relay contract, and further disclosure or any inspection of such return information for a purpose of to an extent unauthorized herein respectively constitutes a felony or criminal misdemeanor punishable upon conviction by a fine as much as \$5,000.00 or imprisonment for as long as 5 years, or both together with the costs of prosecution. These penalties are pursuant to IRC 7213, 7213A, 7431, and 26 CFR Section 301.6103(n)-1.
- 6) Any such unauthorized future disclosure of returns or return information may also result in an award of civil damages against the employee or subcontractor in an amount not less than

- \$1,000.00 with respect to each instance of unauthorized disclosure. These penalties are prescribed by IRC sections 7213 and 7413 and set forth at 26 CFR Section 301.6103(n)-1.
- 7) Employees and subcontractors have been notified of the penalties for improper disclosure imposed by the Privacy Act of 1974, U.S.C 552a. specifically, 5 U.S. C. 552a(I)(1), which is made applicable to subcontractors by 5 U.S.C. 552a(m)(1), provides that any employee of a subcontractor who by virtue of his/her employment or official position, has possession of or access to agency records which contain individually identifiable information, the disclosure of which is prohibited by the Privacy Act or regulations established there under, and who knowing that disclosure of the specific material is so prohibited, willfully discloses the material in any manner to any person or agency not entitled to receive it, shall be guilty of a misdemeanor and fined not more than \$5,000.00.
- 8) Employees and subcontractors shall be responsible for the confidentiality of all calls relayed consistent with Federal Laws, Statutes, and Regulations.
- 9) Employees and subcontractors shall ensure that no records are maintained of any conversation, in accordance with the Privacy Act of 1974 (P.L 93-579), IRC 6103, 6103(n), 26 CFR Section 301.6103 (n)-1, the Internal Revenue Service Acquisition Procedures (IRSAP) and Office of Management and Budget (OMB) guidance on the Privacy Act of 1974 (Federal Register, Volume 52, No. 75, Page 12990).
- 10) This Pledge of Confidentiality will remain in the employee's and subcontractor's file until termination of employment and shall be made available to an authorized representative for the General Services Administration (GSA) as may be requested.

I have read and fully understand the Federal Relay Code of Ethical Behavior. I agree that failure to do so will lead to disciplinary action that may include termination. I agree to process calls in the manner required by the Federal Government as detailed in the Federal Relay contract. I agree to abide by this Code of Ethics even after my employment with Sprint and/or subcontractor ends.

Employee/Subcontractor Signature Date	
Supervisor Signature Date	
Company Name (Print or Type)	
Service Type (check one)  Captioned Telephone/CapTel Relay Conference Captioning/RCC Telecommunications Relay Service/TRS and/or Internet Relay (a.k.a. Federal IP Relay)	
Note: All of Sprint's Employees and subcontractors working on this contract will be acquainted with	h the

applicable portions of FIRMR, the Privacy Act of 1974, and the Freedom of Information Act, and implementing regulations and policies. The employees and subcontractors will also be given copies of the following criminal and civil disclosure and inspection penalties, in full text, IRC 7213, IRC 7213A, and IRC 7431.

# **APPENDIX F:**

**TRS Disaster Recovery Plan** 

## TRS Disaster Recovery Plan

Sprint offers emergency options and uninterruptible power that exceeds the State's minimum requirements by offering an end-to-end approach that is unmatched in the relay industry. Sprint has emergency operations and uninterruptible power systems (UPS) supporting relay call centers, the TRS switches (located at wireline switch sites). Sprint knows a large-scale loss of commercial power is one of the most critical factors impacting access to communication. We have proven programs to keep that from impacting relay services. TRS has UPS and generators to ensure relay users will continue to have access to the service in the event of power outages.

#### Call Center Power Solutions

Sprint provides a cost effective solution with a UPS using a combination of standard battery backup and an auxiliary generator to provide uninterrupted power for an unlimited duration for key components.

- The switch peripherals
- Switch room environment, including: Air conditioning, if required to maintain service, fire suppression systems, emergency lights and system alarms
- CA consoles/ terminals
- CA work site emergency lights
- Call Detail Recording (CDR)

Sprint ensures the UPS system capacity is sufficient to operate the call center during busy season and busy hour load. Sprint has installed power-generating equipment capable of operating call centers for extended periods. In the event of a power outage, the UPS and back-up power generator ensure seamless power transition until normal power is restored. UPS is used only long enough for the backup power generators to come on line – a matter of minutes. Backup power generators are supplied with sufficient fuel to maintain operations for at least 24 hours. Generators can stay in service for longer periods of time as long as fuel is supplied. As a safety precaution (in case of a fire during a power failure), the fire suppression system is not electrically powered. Once the back-up generator is on line, stable power is established and maintained to all TRS system equipment and facility environmental controls until commercial power is restored.

#### Emergency Procedures Training

All Sprint Relay employees are trained on emergency procedures to minimize or prevent disruption to relay users. Sprint instructs its staff on the procedures to be followed in the event of an emergency or service impacting issue. Sprint provides annual training to ensure familiarity with systems and processes. Ad-hoc training is conducted for new procedures or team members.

Sprint's response organizations use exercises to evaluate plans, educate personnel, test functions, and operational capability. Information related to these exercises is propriety to Sprint. Additionally, as part of the nation's critical infrastructure, Sprint participates in coordinated situation drills with Federal Emergency Management Agency (FEMA), the Department of Homeland Security (DHS), and state emergency management agencies to ensure coordinated preparedness and response during a disaster.

- Tabletop Exercises: In a round-table setting, members of the response team meet to discuss responsibilities and describe how to react as a team in an emergency.
- Walk-Through Drills: Both the response team and management perform their emergency functions within the emergency response location.

- Functional Drills: Tests designed to target specific functional processes within the recovery plan such as notification, response, communications, documentation, and team cohesiveness. Often, these functions are tested separately to help identify improvement areas and to eliminate confusion.
- Full-scale Exercises: Exercises simulated to be as close as possible to a real-life disaster.
   They may involve a combination of response teams, management, field operations, and outside agencies.
- After Action Reviews (AARs): Following an incident or an exercise, an AAR is conducted to ask participants to identify areas of success and improvement. These are documented as Lessons Learned and tracked to satisfactory completion.
- Maturity: Sprint uses an internally developed Maturity Model for benchmarking the Business Continuity Program success and progress. The model is based on the Capability Maturity Model as developed by Carnegie Mellon University.

## **Business Continuity**

Industry accepted principles are the basis for Sprint's BC program. Sprint has adopted key principles from standards set by organizations such as the Disaster Recovery Institute International (DRII), ASIS Organizational Resilience Standard, FEMA, Business Continuity Institute (BCI), American National Standards Institute (ANSI), NFPA 1600, International Organization for Standardization (ISO) 27001 and ISO 22301, and several Military Specifications (Mil-Spec) standards. Sprint's Business Continuity Program Overview is reviewed and approved on an annual basis.

Sprint Relay network has a Business Continuity (BC) plan to deal with all types of natural and manmade problems which may prevent calls from reaching the relay center or impact the operation of the TRS platform. The plan identifies how Sprint minimizes impact to relay users and restores relay services. Sprint brings more value when it comes to maintaining operations during natural and manmade events. Sprint's BC methodology and implementation standards are consistent with industrywide best practices and trusted by experts in the field. The Sprint dedicated BC Teams (BCTs) participate in government-provided and private sector training, and maintain certifications from:

- DRII
- International Association of Emergency Managers (IAEM)
- DHS
- Business Continuity Institute (BCI)

Sprint understands the BC challenges faced by government organizations and has designed relay services accordingly. Sprint has experience in serving more than 160 federal entities and more than 150 military bases worldwide including the Department of Defense (DOD), Local Governments, Law Enforcement, and DHS.

Sprint's Business Continuity Management Team works as a customer advocate when large network outages occur. The team works closely with network recovery teams to establish customer prioritization once the backbone, Telecommunications Service Priority (TSP) and Critical Life Circuits are re-established.

All departments within Sprint, including the Sprint Relay program, follow these well-established programs to ensure top-notch support for our customers.

#### Call Center Evacuation Events

Sprint has plans in place to deal with call center events such as fires. Each call center has a designated Safety Marshal and clear chain of command. As a first step, the situation is identified

and the threat is assessed. If evacuation is necessary, the local authorities (e.g., 911) are immediately alerted along with the Call Center Service Assurance Center (CCSA) and the Traffic Management Control Center (TMCC). Call center management and Sprint Corporate Security are also alerted.

Traffic will be re-routed immediately to other call centers not impacted and work with those call centers to increase staffing, as needed. Once the issue is resolved, all communication assistants (CAs) return to the center and the incident is fully documented.

#### Proactive Measures

Over the past 26 years, Sprint Relay users have rarely experienced any type of inability to place calls. Sprint's backup capabilities are unmatched in the TRS industry with 6 call centers (including the location at Sprint headquarters in Overland Park, KS) capable of handling TRS calls and multiple switch locations supporting the TRS platform.

Sprint's switches and call centers are staffed with spare positions and platform components to deal with all types of technical issues. The TRS platform offers automated alarming to notify personnel of issues.

Redundancy is built into our infrastructure to deliver outstanding performance for all of our TRS customers. These attributes will ensure functional equivalency for relay service callers during disasters. The benefits of our leading-edge platform and flexible configuration include:

- Switches, call controllers, and databases are housed in geographically-dispersed locations
  that conform to "critical" grade physical security requirements. Sprint's switches and
  peripherals are located at switch sites in telecom bunkers.
- Redundant connections between switch sites, 800 network, and call centers
- If the problem is within Sprint's TRS center, maintenance can usually be performed from Sprint's centralized center, the CCSA.
- Sprint retains hardware spares at each center to allow for the most common type of repair required without the ordering of additional equipment (except for complete loss of a building).
- Centralized routing and reporting systems enables Sprint to treat the entire call center complex as a single virtual call center rather than standalone call centers
- All TRS positions are capable of handling calls for any customer.
- All training seats are configured and immediately ready to take production traffic.
- Sprint has pre-established plans for all types of outages.
- Sprint automatic routes calls away from a center undergoing a service recovery event. For example, if a fire drill forces CAs to evacuate, the call router automatically sends calls to other relay centers.

Sprint has historically been the best at dealing with natural and man-made disasters that have caused outages. With each incident Sprint has managed to be prepared, respond and ensure ongoing service delivery. Sprint's processes as detailed here take into consideration every aspect of an outage and/or natural disaster that includes a higher call volume likelihood due to the natural disaster. Some examples of disasters that affected Sprint facilities in the past are:

- Wind burst that blew off a portion of the roof of our Syracuse, NY call center
- Farmer cuts Fiber Optic cable servicing Lubbock, TX when burying a cow
- Hurricanes that impacted call centers in Miami and Jacksonville

 Tornado warnings impacting upper Midwest call centers. One evening, 37 Tornadoes were within range of our call center. Our center had to be evacuated. Sprint continued to provide service without interruption.

These list just a few of the natural and man-made disasters we faced, and with each one we were able to maintain our service levels with the processes we have in place. Our employees are the best at ensuring we maintain these service levels.

### TRS Data Center Disaster Planning

Sprint has implemented a distributed architecture for interconnection redundancy utilizing dual fiber facilities at all of our switch locations. These main switch locations currently have battery backup as well as permanent generators. In addition, site recovery plans have been developed for all major switch locations, prioritizing available options for relocation, and ensuring agility when faced with disaster recovery issues. Most switches also have tap boxes to readily connect the output of a portable generator in the event of primary generator issues.

# TRS Winter Preparedness Plan

Sprint has processes in place if a known weather event is encountered. These known contingency plans are designed to mitigate our customers' degradation of service and are maintained by the TMCC. Each service has back-up locations to ensure redundancy.

#### Known Event

- Four days prior TMCC and the Operations Manager will make a determination as to the severity and number of centers which might be affected.
- Three days prior TMCC and the Operations Manager will verify previous day's potential impact and begin calling to non-effected centers to post overtime (OT). All centers will be advised to put a list together of employees who will work overnight and weekends. TMCC will notify one of the Managers of Customer Relations and CCSA of our "game plan"
- Two days prior TMCC will meet with the Operations Manager to update impacts and plan. All non-impacted centers will be called to update OT requirements and overnight requests.
- One day prior TMCC will meet with the Operations Manager to update impacts and plan.
- Day of Event TMCC will invoke emergency call routing as required. TMCC will be the point
  of contact for all notifications. Affected centers will update TMCC every four hours. TMCC
  will update the Operations Manager who will update BC Manager through executive level.
  Management is also responsible for notifying the BCT.

#### Unknown Event

The Activation Criteria Plan will be used when either weather or other events cause potential significant (excess of 25 percent) increase in call volumes or one or more TRS call centers is off-line for more than two hours, using the following procedure:

- Automated alarming and/or TRS call center notifies TMCC
- TMCC contact CCSA
- CCSA sends notification to a pre-established distribution list
- CCSA establishes a conference call to work on resolving the issue with impacted groups

After fix agencies are unable to re-establish center operations – the Business Continuity Plan (BCP) is invoked and Management will notify the Business Continuity Management Team.

# Customer Notification Procedures

Sprint will inform the contract manager of any major interruptions to the TRS service that exceeds

five minutes in duration. To provide the contract manager with the most complete and timely information on problems affecting relay service, Sprint's trouble reporting procedure for TRS includes multiple levels of response:

- Immediate notification of events that last 5 minutes
- Notification when the issue is resolved and/or status updates (every 24 hours)
- Comprehensive final report within 3 days

Within 24 hours of the Relay service disruption, an intermediate report provides problem status and more detail of what action is necessary. In most cases, the 24-hour report reveals the problem has been corrected and full relay service has been restored. The contract manger (or designate) will receive this notification from your Sprint Accessibility Customer Relationship Manager (CRM). He/she and/or a member of the management team will provide the final report and follow up on steps Sprint will take to ensure we can minimize the likelihood of this event occurring again.

Final reports include a comprehensive look at the event, including the following:

- How the problem occurred
- When the problem occurred
- The number of impacted customers (if known)
- What was required to correct the problem
- Time and date the relay service resumed full operation
- Avoidance plan for future (if applicable)

### Temporary Delay Message

If approved by Puerto Rico Relay, Sprint can also provide a temporary delay message for TRS users that is turned on only when long hold times may occur as a result of weather or other event impacting service. For example, if there were a terrorist attack or natural disaster that significantly increased the number of calls to the relay center, Sprint can add a temporary recording that alerts voice and TTY users, such as: "THE RELAY CENTER IS EXPERIENCING LONGER THAN NORMAL HOLD TIMES. PLEASE HOLD FOR THE NEXT AVAILABLE CA OR TRY YOUR CALL AGAIN LATER."

### Telecommunications Service Priority (TSP)

All of Sprint's circuits supporting TRS services have qualified for priority restoration under the TSP program. Sprint's participation in the TSP Program strengthens our robust reliability. If a national or regional emergency causes service to be disrupted and the call center cannot receive or place calls, Sprint's participation in the TSP program means Local Exchange Carriers (LECs) would be required to restore service as rapidly as possible consistent with the priority status assigned. Sprint's reliable network and TSP participation ensures Sprint's disaster recovery ability is unmatched by any Relay provider in the world.

# **APPENDIX G:**

FCC's 2013 TRS Recertification Approval to the TRB (TRS-28-12) Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

News Media Information 202-418-0500 Internet: http://www.foc.gov TTY: 1-888-835-6322

DA 13-1530

Released: July 8, 2013

#### NOTICE OF CERTIFICATION OF STATE TELECOMMUNICATIONS RELAY SERVICES (TRS) PROGRAMS

#### CG DOCKET NO. 03-123

The Federal Communications Commission's (FCC or Commission) Consumer and Governmental Affairs Bureau (Bureau) hereby grants certification to the state telecommunication relay services (TRS) programs listed below, pursuant to Title IV of the Americans with Disabilities Act (ADA), 47 U.S.C. § 223(f)(2), and section 64.606(b) of the Commission's rules. On the basis of the state applications received the Bureau has determined that:

- The TRS programs of the listed states meet or exceed all operational, technical, and functional minimum standards contained in section 64.604 of the Commission's rules:<sup>3</sup>
- (2) The TRS programs of the listed states make available adequate procedures and remedies for enforcing the requirements of their state programs;<sup>4</sup> and
- (3) The TRS programs of the listed states in no way conflict with federal law.

The Bureau also has determined that, where applicable, the intrastate funding mechanisms of the listed states are labeled in a manner that promotes national understanding of TRS and does not offend the public, consistent with section 64.606(d) of the Commission's rules.<sup>3</sup>

Because the Commission may adopt changes to the rules governing relay programs, including state relay programs, the certification granted herein is conditioned on a demonstration of ongoing compliance with any additional new rules that are adopted by the Commission. The Commission will provide guidance to the states, as needed, to ensure compliance with such rule changes.

This certification, as conditioned herein, shall remain in effect for a five (5) year period, beginning July 26, 2013, and ending July 25, 2018, pursuant to 47 C.F.R. § 64.606(c). One year prior to the expiration of this certification, July 25, 2017, the states may apply for renewal of their TRS program.

<sup>&</sup>lt;sup>1</sup> For purposes of this proceeding, the term "state" refers to states, U.S. territories, and the District of Columbia, where applicable.

<sup>2 47</sup> C.F.R. § 64.606(b).

<sup>3 47</sup> U.S.C. § 225(f)(2)(A); 47 C.F.R. § 64.604.

<sup>447</sup> U.S.C. § 225(f)(2)(B).

<sup>5 47</sup> C.F.R. § 64.606(d).

File No: TRS-54-12

Michigan Public Service Commission

State of Michigan

File No: TRS-55-12

Mississippi Public Service Commission

State of Mississippi

File No: TRS-56-12

Telecommunications Access Program

State of Montana

File No: TRS-25-12 Relay Nevada State of Nevada

File No: TRS-45-12

New Jersey Board of Utilities

State of New Jersey

File No: TRS-16-12

New York State Department of Public Service

State of New York

File No: TRS-12-12

Information Technology Department

State of North Dakota

File No: TRS-57-12

Oklahoma Telephone Association

State of Oklahoma

File No: TRS-58-12

Pennsylvania Bureau of Consumer Service

Commonwealth of Pennsylvania

File No: TRS-59-12

Division of Public Utilities and Carriers

State of Rhode Island

File No: TRS-11-12

South Carolina Office of Regulatory Staff

State of South Carolina

File No: TRS-20-12

Tennessee Regulatory Authority

State of Tennessee

File No: TRS-39-12

Minnesota Department of Commerce

State of Minnesota

File No: TRS-15-12

Missouri Public Service Commission

State of Missouri

File No: TRS-40-12

Nebraska Public Service Commission

State of Nebraska

File No: TRS-42-12

New Hampshire Public Service Commission.

State of New Hampshire

File No: TRS-14-12

Commission for the Deaf and Hard of Hearing

State of New Mexico

File No: TRS-30-12

Department of Health and Human Service

State of North Carolina

File No: TRS-37-12

Public Utilities Commission of Ohio

State of Ohio

File No: TRS-36-12

Oregon Public Utilities Commission

State

File No: TRS-28-12

Telecommunications Regulatory Board

Puerto Rico

File Day Tipe 60 10

Micronesian Telecommunications Corporation

Saipan

File No: TRS-60-12

Department of Human Services

State of South Dakota

File No: TRS-17-12

Texas Public Utility Commission

State of Texas

File No: TRS-61-12

Virgin Islands Public Service Commission

U.S. Virgin Islands

File No: TRS-44-12

Vermont Department of Public Service

State of Vermont

File No: TRS-27-12

Office of the Deaf and Hard of Hearing

State of Washington

File No: TRS-01-12

Wisconsin Department of Administration

State of Wisconsin

File No: TRS-09-12 Public Service Commission

State of Utah

File No: TRS-04-12

Department for the Deaf and Hard of Hearing

Commonwealth of Virginia

File No: TRS-06-12

Public Service Commission of West Virginia

State of West Virginia

File No: TRS-18-12

Division of Vocational Rehabilitation

State of Wyoming

The fall text of this Public Notice and filings will be available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, SW., Room CY-A257, Washington, DC 20554. This document and copies of subsequently filed documents in this matter may also be purchased from the Commission's duplicating contractor, Best Copy and Printing, Inc. (BCPI), Portals II, 445 12th Street, SW., Room CY-B402, Washington, DC 20554. Customers may contact BCPI at their website: <a href="https://www.bcpiweb.com">www.bcpiweb.com</a> or call (202) 488-3300. Filings may also be viewed on the Commission's Electronic Comment Filing System (ECFS) at <a href="http://apps.fcc.gov/ecfs//">http://apps.fcc.gov/ecfs//</a> (insert docket No. 03-123 in the proceeding number fill-in block, and the state identification number, (e.g., TRS-46-12) assigned for that specific state application in the bureau identification number fill-in block).

To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to <a href="fcc504@fcc.gov">fcc504@fcc.gov</a> or call the Consumer and Governmental Affairs Bureau at (202) 418-0530 (voice), (202) 418-0432 (TTY). This Public Notice can also be downloaded in Word and Portable Document Format (PDF) at <a href="http://www.fcc.gov/encyclopedia/telecommunications-relay-services-trs">http://www.fcc.gov/encyclopedia/telecommunications-relay-services-trs</a>.

For further information regarding this Public Notice, contact Dana Wilson, Consumer and Governmental Affairs Bureau, Disabilities Rights Office, (202) 418-2247 (voice), or e-mail Dana Wilson@fcc.gov.